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Attorneys for Defendants
GMAC LLC, CAP RE OF VERMONT, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KARAM SINGH BADESHA, FELICIA
FOLMAR, LORI GARRETT, and DONNA
MOORE, individually and on behalf of all other
similarly situated,,

Plaintiffs,

v.

GMAC LLC, CAP RE OF VERMONT, INC.,

Defendants.

Case No. C06-07817

**REVISED STIPULATION AND
[PROPOSED] ORDER
VACATING CASE DEADLINES**

Whereas plaintiffs Karam Singh Badesha, Felicia Folmar, Lori Garrett and Donna Moore (collectively, “plaintiffs”) and defendants GMAC LLC and Cap Re of Vermont, Inc. (collectively, “defendants”) are meeting and conferring in good faith to resolve threshold issues regarding the initial pleadings in an effort to avoid needless motion practice;

Whereas those discussions are ongoing and require the parties to develop and informally exchange additional factual information;

Whereas the parties believe that judicial economy would be better served by postponing initial disclosures, the case management conference, and responsive pleading deadlines until the initial pleadings are further settled;

Whereas the only previous time modification in this case was to extend the time for defendants to respond to the complaint from February 15, 2007 to March 30, 2007, because defendants had been previously represented by different counsel and had only recently retained their current counsel,

Accordingly, the parties, through their respective attorneys, hereby stipulate and request that the Court enter an order as follows:

1. Plaintiffs shall file and serve an amended complaint on or before May 18, 2007;
2. Defendants shall file and serve responsive pleadings on or before June 22, 2007;
3. If either of the defendants’ responses to the amended complaint is a motion, the parties will meet and confer regarding a briefing schedule on such motion(s) and submit their proposed schedule to the Court for approval;
4. The currently pending deadlines in the case — the initial disclosures deadline on March 23, 2007, the case management conference on March 30, 2007, and defendants’ responsive pleading deadline to the original complaint on March 30, 2007 — shall be vacated; the case management conference shall be reset to ~~July 13, 2007~~ ^{July 27, 2007}, at 1:30 p.m.;
5. The parties shall exchange initial disclosures on or before June 15, 2007. The parties shall conduct a Rule 26(f) conference on or before June 29, 2007. The parties shall submit a joint case management statement meeting the requirements of Local Rule 16-9 on or

July 20, 2007
before July 6, 2007. Nothing in this Order shall be construed to affect the parties' rights to
take discovery from parties or nonparties.

Dated: March 28, 2007

MICHAEL J. AGOGLIA
WENDY M. GARBERS
RITA F. LIN
MORRISON & FOERSTER LLP

By: /s/ Wendy M. Garbers
Wendy M. Garbers

Attorneys for Defendants
GMAC LLC, CAP RE OF VERMONT,
INC.

Dated: March 28, 2007

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By: /s/ Alan R. Plutzik
Alan R. Plutzik

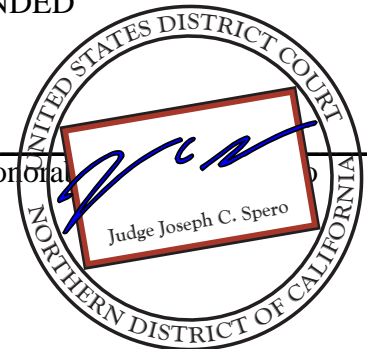
Attorneys for Plaintiffs

[~~PROPOSED~~] ORDER

Pursuant to stipulation, IT IS SO ORDERED AS AMENDED

Dated: March 29, 2007

The Honorable



ECF CERTIFICATION

Pursuant to General Order No. 45, § X.B., the filing attorney attests that she has obtained
concurrence regarding the filing of this document from the signatory to the document.

By: /s/Wendy M. Garbers
Wendy M. Garbers